

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF ALABAMA

NORTHERN DIVISION

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

IN Re: Kerry Knott, A/S 3087001

2:17-cv-00607-MHT

PETITION FOR A PROTECTIVE ORDER:

Comes Now Kerry Knott, a forty-six year old white male with a severe neck injury that has left him disabled and unable to care for himself. Kerry Knott is diagnosed as being an incomplete quadriplegic; and even though he can move his limbs in varying degrees, he is debilitated to the point that he requires physical assistance in all of his basic living skills tasks. Kerry Knott cannot get out of bed and into his wheelchair without the assistance of a strong person. He cannot dress himself, go to the toilet or take a shower without major assistance. Kerry Knott is totally dependant on others to meet his basic living skills requirements because he is not ambulatory and cannot care for himself.

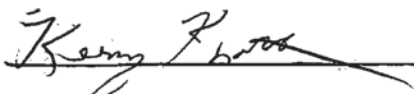
Kerry Knott has been incarcerated in the Alabama Department of Corrections since May of 2017. He was kept at the medical facility at Kilby Correctional facility for three months and then transferred to Easterling Correctional facility. Kerry Knott was housed in the infirmary at Easterling until he filed a P.R.E.A. report due to the prison's policy of placing suicidal inmates overnight in the infirmary, a four-bed unit, without supervision. Kerry Knott was then moved to the faith dorm, a population dorm at Easterling, where he is totally dependant upon the goodwill, patience, and tolerance of other inmates to meet his basic needs. Those inmates are not trained, they are not paid, and they are not appointed. All of the help Kerry

Knott receives at the faith dorm is voluntary and temporary. Mr. Knott is often left without assistance when his current help-mate is in school or otherwise displaced. In addition, the help Kerry Knott receives is not professional and places his health, safety, and welfare in jeopardy every time he is moved by untrained hands.

Kerry Knott made a request to the medical staff to be transferred to a medical facility on August 21 of 2017 and was informed that he would have to take that issue up with the Department of Corrections. Mr. Knott then submitted an A.D.A. Accommodation request form to Easterling Correctional Facility but has received no response as of this date.

WHEREFORE, Kerry Knott prays that this Honorable Court grant him the relief he seeks and issue a protective order to the Department of Corrections in Alabama to transfer Mr. Knott to a proper medical facility where he can receive professional medical care and assistance in his daily activities and needs.

Respectfully Submitted
September 11, 2017


Kerry D. Knott
308701 H2-6a
Easterling Corr. Facility
200 Waller Drive
Clio, AL 36017

305701 H2-64
Ernstling Correctional Facility
200 Wallace Drive
Montgomery, AL 36117

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